

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division**

Kelly Rooney,

Debtor.

Case No. 20-10219-AMC
Chapter 13

Motion to Modify Plan After Confirmation

Debtor Kelly Rooney, through her attorney, moves this Court as follows:

1. The Debtor recently inherited substantial property. Exhibit A.
2. The inheritance necessitates full payment of unsecured creditors in this bankruptcy case.
3. The Debtor requests that the Court enter an order approving the plan filed at ECF No. 68 as the new confirmed plan.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: August 9, 2024

CIBIK LAW, P.C.
Attorney for Debtor

By: /s/ Michael A. Cibik

Michael A. Cibik (#23110)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
help@cibiklaw.com